

# COUGHLIN BETKE LLP

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June 3, 2024

*Via First Class Mail*

Sean Joanis, Esq.  
Jason Stone Injury Lawyers  
225 Friend Street, Suite 102  
Boston, MA 02114

Re: Mara Silvia v. Kohl's Inc.  
*Middlesex Superior Court, C.A. No.: 2381CV02772*  
*USDC MA, C.A. No. 1:23-cv-12672*

Dear Counsel:

With respect to the above-referenced matter, enclosed please find the following:

- 1. Defendant Kohl's Inc.'s Responses to Plaintiff's Request for Admission.*

Thank you for your attention to this matter, and please do not hesitate to contact me or Attorney Thomas DiGangi should you have any questions.

Sincerely,

*Patrick Blais*

Enclosures

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MARA SILVIA,  
Plaintiff,

v.

KOHL'S, INC.  
Defendant

DOCKET NO.: 1:23-CV-12672

**DEFENDANT KOHL'S INC.'S RESPONSES TO PLAINTIFF'S REQUEST FOR  
ADMISSIONS**

Now comes the defendant Kohl's Inc. ("Kohl's") and pursuant to Fed. R. Civ. P. 26 and 36 and responds to plaintiff's First Request for Admissions.

**Request No. 1**

On November 22, 2020, the Defendant, Kohl's Inc., was responsible for the maintenance of the parking lot at 150 Lexington Street in Burlington, Massachusetts.

**Response No. 1**

Objection. Kohl's objects to this Request on the grounds that it is vague, undefined and calls for legal conclusions. Notwithstanding and without waiving said objections, Kohl's states: it had contracted with a third party vendor, Divisions Maintenance Group, Inc. to perform maintenance.

**Request No. 2**

On November 22, 2020, the Defendant, Kohl's Inc., was responsible for ensuring a safe walking surface in the parking lot at 150 Lexington Street in Burlington, Massachusetts.

**Response No. 2**

Objection. Kohl's objects to this Request on the grounds that it is overly broad in scope and calls for legal conclusions.

**Request No. 3**

On November 22, 2020, the Defendant, Kohl's Inc., was responsible for ensuring there were no potholes in the walking surface of the parking lot at 150 Lexington Street in Burlington, Massachusetts.

**Response No. 3**

Denied.

**Request No. 4**

Attached hereto as Exhibit A, is a true and accurate photograph of the parking lot in front of the Kohl's located at 150 Lexington Street in Burlington, Massachusetts as it was on November 22, 2020.

**Response No. 4**

After reasonable inquiry, Kohl's lacks sufficient knowledge and information to either admit or deny.

**Request No. 5**

On November 22, 2020, the Defendant, Kohl's Inc., was responsible for ensuring there were no potholes in the walking surface of the parking lot as indicated with a blue X on Exhibit A, at 150 Lexington Street in Burlington, Massachusetts.

**Response No. 5**

Denied.

**Request No. 6**

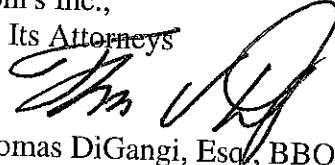
On November 22, 2020, the Defendant, Kohl's Inc., required its employees park in the area shown in Exhibit A.

**Response No. 6**

Denied.

6-3-24

Defendant,  
Kohl's Inc.,  
By Its Attorneys



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**CERTIFICATE OF SERVICE**

I, Thomas DiGangi, do hereby certify that on this 3<sup>rd</sup> day of June, 2024, I served a copy of the within document by first class mail, postage prepaid, to: Sean Joanis, Esq., Jason Stone Injury Lawyers, 225 Friend Street, Suite 102, , Boston, MA 02114; [SCJ@StoneInjury.com](mailto:SCJ@StoneInjury.com)

